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*Attorneys for Defendant Facebook, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JONATHAN D. RUBIN on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC., SCL GROUP, GLOBAL  
SCIENCE RESEARCH LTD., and  
CAMBRIDGE  
ANALYTICA LLC

Defendants.

CASE NO. 3:18-CV-01852-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

**DEFENDANT FACEBOOK, INC.'S  
REPLY IN SUPPORT OF MOTION TO  
STAY**

Hearing Date: May 24, 2018  
Time: 10:00 a.m.  
Location: Courtroom 4, 17<sup>th</sup> Floor, 450 Golden  
Gate Avenue, San Francisco, California,

*(additional captions below)*

1 LAUREN PRICE, on behalf of herself and  
all others similarly situated,

2 Plaintiffs,

3 v.

4 FACEBOOK, INC. and CAMBRIDGE  
5 ANALYTICA,

6 Defendants.

CASE NO. 3:18-CV-01732-VC  
SAN FRANCISCO DIVISION

7  
8  
9 ASHLEY GENNOCK and RANDY NUNEZ, on  
behalf of themselves and all others similarly  
situated,

10 Plaintiffs,

11 v.

12 FACEBOOK, INC. and CAMBRIDGE  
13 ANALYTICA

14 Defendants.

CASE NO. 3:18-CV-01891-VC  
SAN FRANCISCO DIVISION

CONSENT MOTION

15  
16 HOWARD O'KELLY, on behalf of himself and  
all others similarly situated,

17 Plaintiffs,

18 v.

19 FACEBOOK, INC. and CAMBRIDGE  
20 ANALYTICA

21 Defendants.

CASE NO. 3:18-CV-01915-VC  
SAN FRANCISCO DIVISION

CONSENT MOTION

1 THERESA BEINER and BRANDON  
2 HAUBERT, et al., on behalf of themselves and  
all others similarly situated,

3 Plaintiffs,

4 v.

5 FACEBOOK, INC. and CAMBRIDGE  
6 ANALYTICA, LLC

7 Defendants.

8 SUZIE HASLINGER, on behalf of herself and  
9 all others similarly situated,

10 Plaintiff,

11 v.

12 FACEBOOK, INC. and CAMBRIDGE  
13 ANALYTICA LLC

14 Defendants.

15  
16 DEBRA KOOSER and MARGARET  
17 FRANKIEWICZ, on behalf of themselves and all  
others similarly situated,

18 Plaintiffs,

19 v.

20 FACEBOOK, INC., CAMBRIDGE  
21 ANALYTICA, SCL Group, Ltd, and Global  
Science Research Ltd.

22 Defendants.  
23  
24  
25  
26  
27  
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CASE NO. 3:18-CV-01953-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

CASE NO. 3:18-CV-01984-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

CASE NO. 3:18-CV-02009-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

TAYLOR PICHA, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

FACEBOOK, INC. and CAMBRIDGE  
ANALYTICA

Defendants.

CASE NO. 3:18-CV-02090-VC  
**SAN FRANCISCO DIVISION**

CHRISTINA LABAJO, on behalf of herself and  
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC. and CAMBRIDGE  
ANALYTICA

Defendants.

CASE NO. 3:18-CV-02093-VC  
**SAN FRANCISCO DIVISION**

JOSHUA IRON WING and RYAN MCGRATH,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

FACEBOOK, INC.

Defendant.

CASE NO. 3:18-CV-02122-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

SANFORD BUCKLES, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

FACEBOOK, INC.

Defendant.

CASE NO. 3:18-CV-02189-VC  
**SAN FRANCISCO DIVISION**

LUCY GERENA, on behalf of herself and all  
others similarly situated,

Plaintiff

v.

FACEBOOK, INC.

Defendant

CASE NO. 3:18-CV-02201-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

PATRICIA KING, on behalf of herself and all  
others similarly situated,

Plaintiff,

v.

FACEBOOK, INC. and CAMBRIDGE  
ANALYTICA LLC

Defendants.

CASE NO. 3:18-CV-02276-VC  
**SAN FRANCISCO DIVISION**

**CONSENT MOTION**

1 Facebook, Inc. (“Facebook”) respectfully submits this reply in support of its April 18, 2018  
2 Motion to Stay, currently noticed for argument on May 24, 2018.

3 Plaintiffs’ oppositions to Facebook’s motion to stay all proceedings pending a ruling from the  
4 JPML in MDL No. 2843 were due on May 2, 2018. As of today, no plaintiff has lodged an opposi-  
5 tion. Prior to filing, plaintiffs in *Rubin*, *Gennock*, *O’Kelly*, *Beiner*, *Haslinger*, *Kooser*, *Iron Wing*,  
6 *Gerena* and *King* consented to this relief. *O’Kelly* filed a response indicating no objection “provided  
7 it is entered without prejudice to Plaintiffs’ ability to seek interim relief from the Court if necessary,”  
8 which the proposed order already provides. *O’Kelly*, Dkt. 16. *Gerena* also filed a document indicat-  
9 ing plaintiffs’ “nonopposition” to the stay. *Gerena*, Dkt. 18. *Rubin* also filed a pleading indicating  
10 that he “agrees to Facebook’s Motion to Stay.” *Rubin*, Dkt. 32. Other plaintiffs have not filed any  
11 response.

12 As plaintiffs have not opposed Facebook’s requested relief, Facebook respectfully requests  
13 that the Court enter Facebook’s proposed order and, pursuant to Local Rule 7-1(b), that the Court do  
14 so without holding argument.

1 DATE: May 9, 2018

Respectfully submitted,

2 **GIBSON, DUNN & CRUTCHER, LLP**

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16  
17 *Attorneys for Defendant Facebook, Inc.*